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**MEMO ENDORSED**

January 15, 2019

**VIA ECF**

Hon. Kenneth M. Karas  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601

Re: *United States v. Simon Goldbrener, et al.*, 18 Cr. 614 (KMK)

Dear Judge Karas:

We write to respectfully request that the Court modify the bail conditions of Peretz and Susan Klein so as to allow them to travel to Connecticut.

Mr. and Mrs. Klein were indicted and charged with an alleged wire fraud conspiracy to defraud the e-rate program. Dkt. # 2. Mr. Klein was released on a \$1,000,000 bond, secured by \$500,000.00 in property, and co-signed by 2 FRPs. Dkt. # 5. Mrs. Klein was released on a \$500,000 unsecured bond, co-signed by 2 FRPs. Dkt. #6. Travel for both was restricted to S.D.N.Y., E.D.N.Y., N.D.N.Y., and D.N.J.

We now respectfully request that the Court modify Mr. and Mrs. Klein's travel restrictions to allow them to also travel to Connecticut, as religious weekend retreats for the Orthodox Jewish community are often held at hotels in Connecticut. We have spoken to both pre-trial services and the U.S. Attorney's Office and neither has any objection to this request.

Jeremy Gutman, counsel for Mrs. Klein, joins in this request.

Respectfully submitted,

/s/

Gedalia M. Stern

cc: All counsel (via ECF)

Granted.

So ordered-

KMK  
1/16/19